

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

**CERTIFICATION OF DAVID J. STANOCH IN SUPPORT OF
PLAINTIFFS' *DAUBERT* MOTION TO PRECLUDE OPINIONS OF
DEFENSE EXPERT ROGER WILLIAMS, M.D.**

I, **David J. Stanoch**, hereby certifies as follows:

1. I am an attorney at law licensed to practice in the State of New Jersey and admitted to the District of New Jersey. I am an attorney with Kanner & Whiteley, L.L.C. and serve as liaison counsel to the plaintiffs' side in this matter. I am familiar with the facts and circumstances of these actions. I make this certification in support of Plaintiffs' *Daubert* Motion to Preclude Opinions of Defense Expert Roger Williams, M.D.
2. Attached hereto as Exhibit 1 is a true and correct copy of Roger Williams' revised January 28, 2023 report in this matter.
3. Attached hereto as Exhibit 2 is a true and correct copy of the transcript of Roger Williams' January 31, 2023 deposition in this matter.

4. Attached hereto as Exhibit 3 is a true and correct copy of the transcript of Roger Williams' February 17, 2022 deposition in this matter.
5. Attached hereto as Exhibit 4 is a true and correct copy of the FDA's November 29, 2018 Warning Letter to Zhejiang Huahai Pharmaceutical Co., Ltd.
6. Attached hereto as Exhibit 5 is a true and correct copy of a May 13, 2013 press release by the United States Department of Justice concerning Ranbaxy's guilty plea and fine in connection with cGMP violations and false statements.
7. Attached hereto as Exhibit 6 is a true and correct copy of transcript excerpts from the March 21, 2022 deposition of Zhejiang Huahai Pharmaceutical Co., Ltd.'s expert David L. Chesney.
8. Attached hereto as Exhibit 7 is a true and correct copy of an email exchange between Teva employees about the FDA's November 2018 Warning Letter to Zhejiang Huahai Pharmaceutical Co., Ltd. (TEVA-MDL2875-00067084).
9. Attached hereto as Exhibit 8 is a true and correct copy of transcript excerpts from the April 27, 2021 deposition of Teva employee Claire Lyons.
10. Attached hereto as Exhibit 9 is a true and correct copy of transcript excerpts from the April 14, 2021 deposition of Teva former employee and Rule 30(b)(6) designee Daniel Barreto.

By: /s/ David J. Stanoch
David J. Stanoch
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Dated: March 13, 2023